

Certification Inspection Report

BRITISH COLUMBIA PROGRAM

at

LUWAN SENIOR HIGH SCHOOL

SHANGHAI

PEOPLE'S REPUBLIC OF CHINA

NOVEMBER 29-30, 2018

INTRODUCTION

On November 29-30, 2018, a certification inspection was completed on Luwan Senior High School (LSHS) in Shanghai, People's Republic of China, referred to as the School in this report. The purpose of this inspection was to determine whether the requirements for the British Columbia (B.C.) Education Program have been met, according to the *B.C. Global Education Program – Offshore Schools Certification Agreement*. The inspection team (the Team), appointed by the Executive Director of International Education and Independent Schools, British Columbia Ministry of Education (MoE) in accordance with the *B.C. Global Education Program – Offshore Schools Certification Agreement* (the Agreement), consisted of Dr. Heather Smith and Mrs. Beverly Pulyk (Chair).

The School's B.C. program has an enrolment of 63 students, in grades 10-12. LSHS is housed within the larger public Chinese high school. The entire school, which houses the B.C. program, enrolls approximately 700 students.

During their visit to the School, the Team reviewed all standards required in the *B.C. Global Education Program – Offshore Schools Certification Agreement* and *Operating Manual* and met with the School's owner/operator, offshore school representative (OSR), Chinese principal and vice-principal, B.C. principal, B.C. teachers, Chinese teachers and Chinese support staff.

The owner/operator, CINEC Education Group Ltd., is responsible for the B.C. program. CINEC Education Group Ltd. operates three other B.C. offshore schools in China and offers a summer program for school-aged children to experience school in Canada.

The B.C. program's mission statement as noted in the Annual Report is:
We are dedicated to preparing our students for success in a rapidly changing world by providing a supportive learning environment that recognizes and respects individual differences, encourages students to challenge personal limits and promotes excellence.



During the inspection, the principal and offshore school representative noted the special feature of the School to be: the distributed leadership among a number of the staff of the School; the cooperative, professional culture that exists between the CINEC schools; and the genuine care shown for the students.

The Team would like to thank Luwan Senior High School for its hospitality, cooperation and preparedness for the inspection visit.

The School has satisfactorily addressed requirements contained in the previous inspection report.

Requirement Met Requirement Not Met Not Applicable

Comment:

There were no requirements noted in the previous inspection report. However, the School has established goals with respect to the library resource center, English language development, positive working relationships with the Chinese staff, professional development related to best practices and the new curriculum, appropriate use of technology, and marketing.

BUSINESS PLAN

The owner/operator has submitted a business plan to the B.C. Ministry of Education, confirming the sustainability of the program.

Requirement Met Requirement Not Met

Comment:

The Team confirms the business plan items noted in the *B.C. Offshore School Program Annual Report*. Unlike many other offshore schools, the LSHS B.C. program is offered as a “public” program within the local Chinese high school. As such, they are allowed to offer a maximum of 40 student placements per year. Once offered a place in the B.C. program, a family then has to decide if they will indeed register their child. Based on grade 10 registration numbers last year and this year, these numbers warrant sustainability of the B.C. program.



OWNERSHIP AND AGREEMENTS / BUILDING AND SAFETY COMPLIANCE 2.0

2.1 The Owner/Operator meets all requirements as set forth in the B.C. Global Education Program Offshore Schools Certification Agreement (the Agreement).

Requirement Met Requirement Not Met

Comment:

The Team verified all items noted in section 2.1 of the *B.C. Offshore School Program Inspection Catalogue*. The owner/operator meets the requirements set forth in the Agreement, including:

- the qualification criteria for owner/operators as outlined in section 5.0 and schedule A of the Agreement.
- public announcements regarding the School outlined in section 8 of the Agreement.
- that the owner/operator and principal are aware of the requirement to report the dismissal, suspension and/or discipline of teachers as required in section 17 of the Agreement.

A letter dated January 22, 2018, from the Shanghai Huangpu District Education Bureau, is on file at the School and confirms that the Bureau approves and has no objection to the continuation of the B.C. program.

2.2 The School meets local building, safety and cafeteria codes and regulations. The facilities are deemed to be suitable to support the B.C. program.

Requirement Met Requirement Not Met

Comment:

LSHS, located in the Huangpu District in Shanghai, is a gated, multi-school campus property with security guards positioned at the entrance. LSHS shares the facility with the established Chinese public high school (one of the three schools on the property). The B.C. program, located on the sixth floor, includes administration offices, staff work areas, general classrooms, library, meeting rooms and a computer lab. LSHS has access to the specialty rooms in the rest of the building (a number of specialized science and technology labs, the Chinese library, an activity room, auditorium, gymnasium, cafeteria, outdoor basketball courts, soccer field surrounded by a 400-meter track). Twenty-two of the 63 students live in the residence on campus. Chinese staff members supervise students outside of school hours.

An on-site nurse provides medical services to students and staff. The cafeteria is inspected annually; the current Cafeteria Operation Certificate is posted on a wall in the cafeteria. The Food Services Certificate, valid to August 11, 2021, is located in the same area.



The staff handbook includes emergency plans for accidents, fire, security, earthquake and emergency evacuation. Students practise fire and/or earthquake drills four times a year. A separate emergency document notes that “in the case of an emergency such as a natural disaster or for any event that would cause an unplanned temporary or permanent closure of the School, CINEC would fulfill the Personal Services Agreement with their employees. CINEC would endeavor to have the B.C. offshore school program continue to the end of term and would support and assist in continuing to have a B.C. program available to students for the next term.” The offshore school representative has vetted the emergency plans for accuracy and functionality.

The Team completed a review of the facilities and deemed them suitable to support the B.C. program.

Commendation:

LSSH is commended for the relationship that exists with the Chinese high school which supports the B.C. program by allowing full access to the extensive facilities of LSSH. In particular, the science and technology areas provide for a wide variety of learning opportunities.

ADMINISTRATION 3.0

3.1 Offshore school representative (OSR) - The owner/operator must appoint an individual to act as offshore school representative. This individual must be confirmed by the Province and must meet all of the requirements set out in section 14 of the Agreement.

Requirement Met Requirement Not Met

Comment:

The offshore school representative, appointed by the owner/operator, began his appointment in September 2014. He also serves as the Superintendent for all CINEC schools. The OSR’s extensive teaching and administrative experience in both B.C. and offshore schools, provides him with the requisite background knowledge and expertise for this position. The Team confirmed that the OSR meets all the requirements set out in section 14 of the Agreement. The OSR is supported by the deputy superintendent of CINEC schools. The OSR is aware of his obligation to report to the Ministry of Education critical information relating to changes in the operation of the School or ownership structure that could significantly impact the school(s) operation(s).



3.2 The Principal meets the requirements as outlined in section 3.2 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

The principal was appointed to his position at LSHS effective the 2017/18 school year and is responsible for all of the principal duties noted in section 3.2 of the *B.C. Offshore School Program Inspection Catalogue*. He has seven years of experience working in B.C. offshore programs in China; the last five have been with CINEC, where he has served as a teacher, vice-principal and now principal. The principal is fluent in Chinese and this is an asset in being able to communicate freely with Chinese staff and parents.

3.3 The School meets the administrative support requirements as outlined in section 3.3 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

The principal of LSHS is supported by a secretary. She is responsible for office duties, marketing, communication with Chinese staff, and translations. Chinese staff that work with and/or support the B.C. program include: the vice-principal assigned to the B.C. program, assistant to the director of international education, and one head teacher for each grade. The CINEC superintendent and deputy superintendent support the principal and staff of the School.

Web TESS, a WINDSOR data management system, is used to store and transmit school and student data to the B.C. Ministry of Education. TESS and TRAX are managed by the B.C. principal and vice-principal.

The School meets the level of Internet connectivity as required by the B.C. Ministry of Education.

3.4 The School meets the Student Record requirements as outlined in section 3.4 of the Inspection Catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

Student files, housed in the principal's office, are maintained by the principal and the secretary. Student files contain a copy of the student registration form, student demographic information, English language assessment and results of that assessment, report cards and signed B.C. Ministry of Education Personal Information Consent Forms. The Permanent



Student Records (Forms 1704) are available in electronic format only. Student and parent consent forms have been updated based on the Ministry guidelines for the 2018/19 school year. All necessary information is stored electronically so it can be reproduced in case of calamity.

3.5 The School meets the teacher certification requirements as outlined in section 3.5 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

The Team confirms that all authorized persons under the Agreement possess valid and current certification under the B.C. Teacher Regulation Branch. The Team also confirms all items outlined in section 3.5 of the *B.C. Offshore School Program Inspection Catalogue*. B.C. teachers plan, evaluate and provide instruction. Locally certified Chinese teachers teach Mandarin, Information Technology, Physical Education and Chinese Culture. The locally certified Chinese teachers have appropriate documentation on file. There are no teacher assistants employed by the School.

Teacher files are stored in the principal's office. These files include: employment application, Teacher Regulation Branch and current membership, contracts, signed personal information consent forms, work visas, and permanent residency documents. The terms and conditions of employment are included in the teacher and the principal's contracts, with the exception of language regarding the "availability of instructional supplies". Teacher evaluation records were not evident with the exception of the principal's evaluation.

Professional development events for teachers this year includes: a two-day orientation prior to starting classes in September; one professional development (Pro-D) day with the other CINEC teachers with a focus on implementation of the new B.C. curriculum; and English, Socials and Mathematics/Science roundtables with other B.C. offshore schools. Professional sharing time has been built into the schedule; it is a time where teachers present on a topic that reflects a current challenge in the School. Professional development funds are available for teachers to attend professional development of their choosing.

CINEC provides incentives promoting the retention of teachers, such as completion and signing bonuses.

Commendation:

LSHS is to be commended for the retention rate of its teachers which ensures ongoing consistency of the B.C. program.



EDUCATIONAL PROGRAM 4.0

4.1 The School meets the requirements for curriculum implementation outlined in section 4.1 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

LSSH has implemented the new curriculum in grade 10. This is evident in teacher planning as many yearly planning documents now include the Big Ideas and curricular competencies. The new curriculum is also evident in classrooms as teachers are experimenting with new teaching practices and being intentional in implementing more student-directed activities.

The principal reports that the grade 10 program this year at LSSH includes: Composition, Creative Writing, New Media, Spoken Language, Math, Science, Career Life Education, Social Studies, Physical and Health Education (PHE), Mandarin, Chinese Culture and Information Technology.

The School has purchased additional novels and resources pertaining to the new curriculum and are pursuing integrating First Peoples' content into classes.

The School has begun implementing the new grades 11-12 curriculum in this draft year. Changes are evident in both course planning and content. The School is on target for full implementation for 2019-20. Students in grade 11 currently take the following subjects: English, Social Studies, Math, Physics, Chemistry, PHE, Drama, Mandarin and Chinese Culture. Grade 12 courses include: English, Math, Calculus, Physics, Chemistry, Biology, Mandarin and Grad Transitions.

Teachers show varied levels of understanding in regards to elements of the new curriculum. The School has engaged in professional development with other CINEC schools in regards to the new curriculum. Last year the School hosted a roundtable regarding English in the new curriculum with other B.C. offshore schools. Over twenty schools attended and participants compiled their electronic files to provide each participant with a resource package of teaching material.

For the 2018-19 school year, the School has changed their timetable to implement time for students to develop a self-directed passion project. They are working on integrating this project with reflections on core competencies and potentially the Capstone project.

Commendation:

The School is commended for innovatively pursuing ways to personalize curriculum for students as demonstrated in opportunities like the passion project, offering online options and increasingly inviting student voice and choice in many classrooms.



4.2 The School meets the requirements for English language assessment and acquisition as outlined in section 4.2 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

Students applying to Luwan Senior High School must first achieve 50% on their grade 9 Chinese exam. Student applicants then participate in an English language proficiency assessment. The assessment contains two writing prompts, grammatical questions, two reading periods with multiple choice questions to assess comprehension, an interview section that is assessed on a rubric, and a listening exercise. The Principal oversees the entrance assessment and is responsible for making the final decision in respect to student assessment and admissions.

LSHS offers eight English credits per grade level. In grade 10, students are taking four of the five new English courses outlined in the new curriculum. The School has developed a student academic support model which offers a lunch hour games room, English challenge and academic support as needed.

The LSHS teachers are intentional about developing second language learners. Activities in all the subjects require students to practice English skills in reading, writing, listening and speaking. These skills are routinely assessed across the new curriculum. The Team observed teachers conferencing and working one-on-one with student learners and noted that teachers seek to be available to support students during and beyond the school day. Posters in the hallway encouraged English language speaking and suggested ways to improve language learning.

The Luwan “Chit Chat Competition” forms part of the School’s house activities. Students start each day with three chit chat cards and either lose or gain cards during the day depending on the language they are speaking. House teams compete for positioning of their flag and for lunch prizes.

Commendation:

LSHS is commended for positively reinforcing student communication in English through an incentive program in their house competition/chit chat program.



4.3 The School meets the course credit requirements (equivalency, challenge, exemptions and BAA courses) as outlined in section 4.3 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

The School has Ministry exemptions on file from 2013-2014 for the following courses: PE 10 and 11; Mandarin 10-12; Information Technology 10-11 and Chinese History 12. Additionally, the School gained Ministry approval for a four-credit BAA course called Chinese Culture 10-12 in 2015, with a framework indicating the students will complete 30 hours of each of Chinese History, Politics and Geography in this course.

Of the exempted courses, LSHS is currently offering PHE 10, Mandarin 10, 11 and 12 and Information Technology 10. These courses are taught by Chinese teachers. Upon review of the School's TRAX submission, each of these courses appears as a regular graded course and the student receives credit for them towards the B.C. Graduation Program.

The Chinese culture course offerings are in transition this year and the School's paperwork will need to be updated accordingly. Last year, the School offered a Chinese History and Culture 11 course for four credits. This year, the School has changed their program to offer a two-credit Chinese Culture 10 Course that will cover Geography and a two-credit Chinese Culture 11 course that will cover Chinese History and Politics. It was noted that separate courses are being reported on student report cards and transcripts using the same course code (YAES 11). The same course name "Chinese Culture" and this same course code (YAES 11) is currently being used for both Chinese Culture 10 and Chinese Culture 11 but the course content is different.

As the School determines course content and how they will configure these courses, yearly plans will need to be developed and made available in English and the School will need to meet the requirements outlined in the *Operating Manual for Offshore Schools* that indicate that "Local Culture 10-12 courses must meet BAA course requirements" (if considered an exempted course) or "all grade 10 BAA courses must align with the new curriculum frameworks for the 2018-19 school year" (if considered a BAA course).

Requirement:

Yearly plans for Chinese Culture 10 and 11 that differentiate course content/assessment will need to be developed and made available in English. The School must meet the requirements outlined in the *Operating Manual for Offshore Schools* for BAA and exempted courses.



4.4 The School meets the course overview/course planning requirements as outlined in Schedule B Part I, 2. (d) of the Agreement; namely, that all B.C. program courses offered in the School meet or exceed the ministry learning outcomes/learning standards identified in the educational program guides for each course.

Requirement Met Requirement Not Met

Comment:

Grade 10 Curriculum

Evidence of course overviews/yearly planning is in place for all courses offered at LSHS, with the exception of Mandarin 10 and 11.

The principal indicates that students at LSHS are enrolled in and take Mandarin 10 and 11 classes at the School; they are assessed as all other students in other B.C. courses. A review of student report cards and TRAX indicates that students are receiving regular B.C. course credit for these classes, so yearly planning documents need to be available in English for these courses. Current TRAX reports do not suggest that these courses have been “challenged” or granted “equivalency” credit.

As students are receiving credit for Mandarin 10-12, planning documents which differentiate course and content should be developed for each of these courses and translated into English. A yearly plan is currently available for Mandarin in grade 12 but planning needs to be developed and made available in English for Mandarin 10 and 11. Revised yearly planning for grade 10 courses should reflect Big Ideas, the integration of First Peoples’ Principles of Learning and core competencies.

As the School continues their shift from a content-driven to a competency-based curriculum, it is suggested that the School continue to invest time into yearly planning documents. Course overviews should be updated: to eliminate former terminology and non-applicable information; to incorporate the language of the new curriculum such as using new course titles and codes; and to include the integration of First Peoples’ Principles of Learning and core competencies within each course.

Teaching staff have decided to divide the learning standards for PHE 10 by moving the health components of the curriculum to Career Education 10. Teachers have indicated with clarity which standards have been incorporated from the PHE curriculum into the Career Life Education 10 course overview. The teachers are encouraged to now consider how those learning standards will be assessed and reported.

Grades 11-12 Curriculum

The School is already offering some of the new courses in grade 11 and 12. Traditional course overviews are in place for grade 11 and 12 courses.

As LSHS is a small school, teachers carry many teaching responsibilities with increased lesson preparation as teachers are required to teach a number of courses. It is evident that the



teachers at LSHS are working hard to teach the learning standards of the new curriculum in a meaningful manner.

Commendation:

Teachers at LSHS are to be commended for their overall dedication and creative lesson planning. It is evident that the teachers at LSHS are working hard to create engaging lessons as they teach the standards of the new B.C. curriculum.

4.5 The School meets the instructional time allotment requirements as outlined in section 4.5 of the inspection catalogue for offshore schools, including the requirements set out in sections 1.1 to 6, with the exception of s. 4(5)(b), 4 (6), 5 (8)(a) and (d) and s. 5.3 of Ministerial Order 41/91, the Educational Standards Order, enacted under the Independent School Act.

Requirement Met Requirement Not Met

Comment:

Students attend classes for six hours a day and the school calendar shows 187 days of instruction; the total annual hours surpasses the requirement of 850 instructional hours per year.

4.6 The School meets the assessment methods requirements as outlined in section 4.6 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

The School provides parents with course previews including an explanation of assessment methods. Teacher planning documentation reflects assessment plans. The principal relayed that there is ongoing monitoring and discussion of student performance data in the school. Strategies like having teachers “group mark” assignment are used to ensure that student assessment is accurate and consistent. The School targets areas for student growth strategically. This year staff recently noted that grade 11 students needed encouragement to engage in class discussions, so the school has focused on that aspect of their language development. The School uses *Read Theory* to differentiate reading levels for students.

Schoology is being used as a Learning Management System (LMS) so teacher gradebooks can be accessed by the principal who monitors class activities and the type/variety of assessments used throughout the school on an ongoing basis. The School indicates that English 12 is taught with great care and intentionality as they prepare students for the provincial exam. Students can also access their progress in each course on an ongoing basis with the continuous reporting occurring through Schoology.



LSHS is seeing students showing stronger results with each graduating class and so are moving from having to offer extended support for at-risk students to focusing on engaging students in more challenging and enriching activities. The School's performance on provincial assessments has been strong for an offshore school.

The School ensures the integrity and security of provincial assessments. The principal receives the password and prepares a computer work station for all students. Invigilators supervise the exam and circulate as the students write the exam to ensure academic honesty.

The Team noted the extensive use of rubrics and a six-point scale throughout the building and teachers are using B.C. performance standard criteria to evaluate student performance. The teachers discuss formative and summative assessment and it was noted that course overviews are starting to reflect this language with a shift to emphasising guided practice in preparation for a summative assessment of student learning in some courses.

Teachers have reviewed and administered the provincial numeracy assessments and the Principal is encouraged to begin reviewing the new literacy assessment specification document with his staff.

The Team reviewed the inspection data report as provided by the Ministry with the principal. It was noted that the student graduation rates were higher than the provincial average.

Commendation:

The students and staff of LSHS are to be commended for their students' performance on the provincial assessments as an offshore school.

4.7 The School meets the learning resources requirements as outlined in section 4.7 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

The School is actively seeking to provide resources to align with the new curriculum. The principal has recently purchased additional sets of novel studies for the English program. Teachers have worked on further resourcing their school's library over the past year, with the specific goals of providing literature at a variety of reading levels and increasing the collection of fiction resources. In addition to the B.C. program's library, students at the School may access the English section of the Chinese school's library. The library is a space used often by students who access books to complete daily assignments, for more extensive research and for reading pleasure.



Several teachers at this school are experienced and after teaching ELL for a number of years, have developed a skill-set and collection of strategies/resources in second language teaching. Approaches to teaching ELL forms part of the School's staff orientation each fall, and teachers regularly discuss students, student performance and curriculum throughout the year. Teachers have created a common resource bank where all lesson material is deposited so that incoming teachers receive an electronic file pertaining to the area in which they teach. As directed, the Team reviewed the Ministry's ELL teaching resource webpage with the principal.

Students and staff have access to technology as the offshore program has a new computer lab on their floor of the School as well as additional labs available in the building. Staff may book these labs for use during class time and students used the new lab frequently during the Team's visit.

Chinese and English teachers share office space and work closely at LSHS as they share a common purpose and support each other's instruction. It is evident that their partnership allows staff to better know and understand their shared students, while proving a positive learning environment with enriched opportunities for student learning.

Commendation:

All staff members affiliated with the B.C. program at LSHS are to be commended for their intentionality to work towards a high level of integration and collaboration between the Chinese and Canadian staff.

4.8 The School meets the student progress report requirements as outlined in section 4.8 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

Student progress reports at LSHS comply with the Reporting Order. The School issues four formal report cards each year that reflect percentage, letter grades, effort and teacher comments. Teachers hold two parent-teacher interview sessions each year. Chinese speaking staff provide translation for the parents and other teachers as required.

Additionally, the School has frequent communication with parents through their website, principal presentations, WeChat, newsletters and information sent through parent email groups.



POLICY DEVELOPMENT 5.0**5.1 The School meets the parent/student handbook requirements as outlined in section 5.1 of the inspection catalogue for offshore schools.**

Requirement Met Requirement Not Met

Comment:

The parent/student handbook is updated each year by the principal. The handbook is written in English. The Team confirmed that the handbook meets the requirements as outlined in the inspection catalogue (i.e. Appeals and Dispute Resolutions Policy, policies related to assessment, admissions, student conduct and supervision).

5.2 The School meets the teacher handbook requirements as outlined in section 5.2 of the inspection catalogue for offshore schools.

Requirement Met Requirement Not Met

Comment:

The teacher handbook is updated annually by the principal and meets all requirements as outlined in the inspection catalogue.

COURSE ACCREDITED VIA DISTRIBUTED LEARNING 6.0**6.1 The School meets the distributed learning requirements as outlined in section 18 of the Agreement and Section 6 of the inspection catalogue for offshore schools.**

Requirement Met Requirement Not Met Not Applicable

Comment:

The School offers one course through distributed learning (DL). Physics 12 is offered to nine students through Global Education – SD 73 Business Company the Ministry's approved service provider. Physics 12 is an online course and the School's principal is the on-site facilitator. A B.C. program Science teacher also provides support as needed. Students are provided with an instructional block to work on this course and they use one of the three computer labs on the campus during this time.

The School has no specific plans to expand DL course offerings in the future; however, an interest was recently expressed in exploring options that might create additional learning opportunities for students.



CONCLUSION

Commendations

The Inspection Team wishes to recognize the owner/operator, principal and staff of Luwan Senior High School for:

- the relationship that exists with the Chinese high school which supports the B.C. program by allowing full access to the extensive facilities of LSHS, in particular, the science and technology areas provide for a wide variety of learning opportunities;
- the retention rate of its teachers which ensures ongoing consistency in the B.C. program;
- pursuing ways to personalize the curriculum for students as demonstrated in opportunities like the passion project, offering online options, and increasingly inviting student voice and choice in many classrooms;
- positively reinforcing student communication in English through an incentive program in their house competition/chit chat program;
- the teachers' overall dedication and creative lesson planning. It is evident that the teachers at LSHS are working hard to create engaging lessons as they teach the standards of the new B.C. curriculum;
- the students' level of performance on the provincial assessments as an offshore school; and
- the intentionality between the Chinese and Canadian staff to work towards a high level of integration and collaboration.

Requirements

In order to meet the requirements of the *B.C. Global Education Program – Offshore Schools Certification Agreement*, the Team requires that by April 15, 2019, the Owner/Operator provide the Executive Director of International Education and Independent Schools, responsible for B.C. Global Education Program - Offshore Schools, with a plan and timeline for proposed implementation of the following items:

- Yearly plans for Chinese Culture 10 and 11 that differentiate course content/assessment will need to be developed and made available in English. The School must meet the requirements outlined in the *Operating Manual for Offshore Schools* for BAA and/or exempted courses.

SUMMATIVE RECOMMENDATION

The Offshore Inspection Team recommends to the Executive Director of International Education and Independent Schools that, contingent on responding to the above requirements to the satisfaction of the Executive Director, the British Columbia education program offered at Luwan Senior High School continue to be recognized as a British Columbia-certified school.

